

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Najwa Alkhatib	Debtor(s)	CHAPTER 13
MIDFIRST BANK	Movant	
vs.		
Najwa Alkhatib	Debtor(s)	NO. 19-17973 AMC
Kenneth E. West Esq.	Trustee	11 U.S.C. Section 362

**MOTION OF MIDFIRST BANK  
TO APPROVE PARTIAL CLAIM**

1. The Movant is MIDFIRST BANK.
2. Debtor(s) is/are the owner(s) of the premises 6214 Webster Street, Philadelphia, PA 19143, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$83,331.00 on the mortgaged premises that was executed on May 30, 2003. Said mortgage was recorded on July 2, 2003 at Document ID Number 50704543. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on August 5, 2008, at Document ID Number 51948139 in Philadelphia County.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. Debtor has applied and been approved for a Partial Claim Agreement with Movant. The Loan Modification is attached hereto as Exhibit "A".
6. Movant seeks Court approval of the Partial Claim by way of the within Motion.
7. Approval and recordation (if applicable) of the Partial Claim shall not constitute a violation of the automatic stay.
8. Upon Court approval of the within Motion, Movant shall file an Amended Proof of Claim to reflect the Partial Claim within thirty (30) days of the entry of any such Order.

WHEREFORE, Movant prays that an Order be entered approving the Partial Claim Agreement and allowing for the recordation of such agreement (if applicable).

**/s/ Rebecca A. Solarz, Esquire**

Rebecca A. Solarz, Esquire

Attorneys for Movant/Applicant

Main Phone #: 215-627-1322